

PART III: DIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING PRODUCTS

Claimant objects for the reason that the request is unduly burdensome give the time constraints claimant has to provide the information. For many years prior to WR Grace's bankruptcy, claimant through claimant's counsel had a tolling agreement with WR Grace which prevented litigation and discovery against WR Grace. Claimant is now being requested to produce trial ready evidence without the ability to individually discover evidence against WR Grace concerning specific job sites worked at by claimant and in a time frame that is unrealistically short. In addition, WR Grace historically has resolved claims for exposure at the job sites at issue, and WR Grace has access to the information concerning exposure which has been provided to WR Grace as part of prior administrative settlements. This request is therefore redundant and the information is as readily available to WR Grace as to claimant. Without waiving these objections, see attached for the exposure information currently available to claimant. In addition, claimant refers WR Grace to the Master Product Identification Evidence which has been submitted for all claimants and is incorporated herein by reference.

Please complete the chart below for each site at which you allege exposure to Grace asbestos-containing products. If you allege exposure at multiple sites, the Court has ordered that you must complete a separate chart for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked.

In the "Nature of Exposure" column, for each job listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Grace asbestos-containing products
- (b) A worker who personally removed or cut Grace asbestos-containing products
- (c) A worker who personally installed Grace asbestos-containing products
- (d) A worker at a site where Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (e) A worker in a space where Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (f) If other, please specify.

Site of Exposure:

Site Name: _____

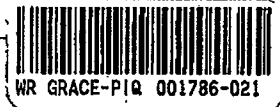
Location: _____

Site Type: ☐ Residence ☐ Business Site Owner: _____

Employer During Exposure: _____ Unions of which you were a member during your employment: _____

Job 1 Description:	Product(s)	Basis for Identification of Each Grace Product	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code (Code 59- If Code 59- specify)	Industry Code (If Code 118- specify)	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? If Yes, please indicate your regular proximity to such areas	Nature of Exposure
General maintenance	Zonolite	General maintenance	1964-1967	15	108	Close proximity	D
Job 2 Description: Ammeral Job	Zonolite	General maintenance	1967-1973	15	103	Close proximity	D





Job 3 Description: General Maintenance	Zenobite	Crewwork	1968-1969	15	100	Close proximity	A
Job 4 Description: AC Spark	Zenobite	Crewwork	1970	15	100	Close proximity	D
Job 5 Description: Safety Photo Zenobite	Zenobite	Crewwork	1970	15	100	Close proximity	D
Job 6 Description:							
Job 7 Description:							
Job 8 Description:							
Job 9 Description:							
Job 10 Description:							
Job 11 Description:							
Job 12 Description:							
Job 13 Description:							
Job 14 Description:							
Job 15 Description:							
Job 16 Description:							

PART IV: INDIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING PRODUCTS

1. Are you asserting an injury caused by exposure to Grace asbestos-containing products through contact/proximity with another injured person? ☐ Yes ☒ No

If yes, complete questions 2 through 10 of this section for each injured person through which you allege exposure to Grace asbestos-containing products. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.

2. Please indicate the following information regarding the other injured person:

Name of Other Injured Person: _____ Gender: ☐ Male ☐ Female

Last Four Digits of Social Security Number: _____ Birth Date: ____ / ____ / ____

3. What is your Relationship to Other Injured Person: ☐ Spouse ☐ Child ☐ Other

4. Nature of Other Injured Person's Exposure to Grace Asbestos-Containing Products:

5. Dates Other Injured Person was Exposed to Grace Asbestos-Containing Products:

From: ____ / ____ / ____ To: ____ / ____ / ____

6. Other Injured Person's Basis for Identification of Asbestos-Containing Product as Grace Product:

7. Has the Other Injured Person filed a lawsuit related to his/her exposure? ☐ Yes ☐ No

If yes, please provide caption, case number, file date, and court name for the lawsuit:

Caption: _____

Case Number: _____ File Date: ____ / ____ / ____

Court Name: _____

8. Nature of Your Own Exposure to Grace Asbestos-Containing Product:

9. Dates of Your Own Exposure to Grace Asbestos-Containing Product:

From: ____ / ____ / ____ To: ____ / ____ / ____

10. Your Basis for Identification of Asbestos-Containing Product as Grace Product:

[REMAINDER OF PAGE INTENTIONALLY BLANK]

PART V: EXPOSURE TO NON-GRACE ASBESTOS-CONTAINING PRODUCTS

Claimant objects for the reason that the request is unduly burdensome and equally accessible to WR Grace as claimant. Claimant is being requested to produce trial ready evidence in an unrealistically short time frame and in a time frame that does not necessarily track the discovery schedules of the underlying tort case. Further, this information is not necessary to determine exposure to a WR Grace product and would be irrelevant in determining whether a prima facie case exists against WR Grace. Additionally, WR Grace has equal access to this information. Without waiving these objections, claimant refers WR Grace to claimant's complaint in the underlying tort case which contains claimant's allegations of exposure and defendants' responses and motions concerning complaint's allegations.

Please complete the chart below for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate chart for each party. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked. In the "Nature of Exposure" column, for each product listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Non-Grace asbestos-containing products
 (b) A worker who personally removed or cut Non-Grace asbestos-containing products
 (c) A worker who personally installed Non-Grace asbestos-containing products
 (d) A worker at a site where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
 (e) A worker in a space where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
 (f) If other, please specify.

Party Against which Lawsuit or Claim was Filed:

Product(s)	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code <i>If Code 59 specify</i>	Industry Code <i>If Code 118 specify</i>	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? <i>If Yes, please indicate your regular proximity to such areas</i>	Nature of Exposure
Site of Exposure 1 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____ Job 1 Description: _____ Job 2 Description: _____ Job 3 Description: _____					
Site of Exposure 2 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____ Job 1 Description: _____ Job 2 Description: _____ Job 3 Description: _____					





Site of Exposure 3 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____	Job 1 Description:								
	Job 2 Description:								
	Job 3 Description:								

PART VI: EMPLOYMENT HISTORY



See attached work history.

Other than jobs listed in Part III or V, please complete this Part VI for all of your prior industrial work experience up to and including your current employment. For each job, include your employer, location of employment, and dates of employment. Only include jobs at which you worked for at least one month. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

Occupation Code: 15 If Code 59, specify: _____
 Industry Code: 108 If Code 118, specify: _____
 Employer: General Motors
 Beginning of Employment: 1/1964 End of Employment: 1/1967
 Location: Truck & Coach Plant
 Address: Gilnt M
 City: _____ State/Province: _____ Zip/Postal Code: _____

Occupation Code: 15 If Code 59, specify: _____
 Industry Code: 103 If Code 118, specify: _____
 Employer: Quens Corning Fibers Inc
 Beginning of Employment: 1/1967 End of Employment: 1/1973
 Location: Various
 Address: M
 City: _____ State/Province: _____ Zip/Postal Code: _____

Occupation Code: 15 If Code 59, specify: _____
 Industry Code: 108 If Code 118, specify: _____
 Employer: Quens Corning
 Beginning of Employment: 1/1968 End of Employment: 1/1969
 Location: Quick Motors
 Address: Gilnt M
 City: _____ State/Province: _____ Zip/Postal Code: _____

Occupation Code: 15 If Code 59, specify: _____
 Industry Code: 108 If Code 118, specify: _____
 Employer: Quens Corning
 Beginning of Employment: 1/1970 End of Employment: 1/1970
 Location: AC Spark Plug Parts Plant
 Address: Gilnt M
 City: _____ State/Province: _____ Zip/Postal Code: _____

PART VII: LITIGATION AND CLAIMS REGARDING ASBESTOS AND/OR



a. LITIGATION

1. Have you ever been a plaintiff in a lawsuit regarding asbestos or silica? ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(a) for each lawsuit. For your convenience, additional copies of Part VII are attached as Appendix G to this Questionnaire

2. Please provide the caption, case number, file date, and court name for the lawsuit you filed:

Caption: _____

Case Number: 96-44789-NP

File Date: 3/12/1996

Court Name: Genesee County Circuit Court

3. Was Grace a defendant in the lawsuit? ☒ Yes ☐ No

4. Was the lawsuit dismissed against any defendant? ☐ Yes ☐ No

Claimant objects because this request is unduly burdensome. As WR Grace well-knows, during the course of a lawsuit defendants are dismissed or added as evidence develops. In order to accurately answer this question, claimant would have to review the docket of the entire case which WR Grace can do as readily as claimant.

If yes, please provide the basis for dismissal of the lawsuit against each defendant:

Claimant objects for the reasons stated above

5. Has a judgment or verdict been entered? ☐ Yes ☒ No

Claimant interprets "judgment or verdict" to mean a finding of liability after a trial on the merits of an unliquidated claim. Based upon this understanding the answer is "no".

If yes, please indicate verdict amount for each defendant(s): _____

6. Was a settlement agreement reached in this lawsuit? ☒ Yes ☐ No

Claimant objects for the reason that such information is confidential and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the disclosure of such settlement information would chill settlement discussions with any remaining defendants. Claimant also objects because such information is not discoverable under controlling state law at this stage of litigation.

If yes and the settlement was reached on or after April 2, 2001, please indicate the following:

a. Settlement amount for each defendant: _____

b. Applicable defendants: _____

c. Disease or condition alleged: _____

d. Disease or condition settled (if different than disease or condition alleged): _____

7. Were you deposed in this lawsuit? ☒ Yes ☐ No

If yes and Grace was not a party in the lawsuit, please attach a copy of your deposition to this Questionnaire.

REDACTED

b. CLAIMS

1. Have you ever asserted a claim regarding asbestos and/or silica, including but not limited to a claim against an asbestos trust (other than a formal lawsuit in court)? ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(b). If no, please skip to Part VIII.

Claimant objects on the basis that the information requested is confidential and is not reasonably calculated to lead to the discovery of any admissible evidence. In addition, by violating the confidentiality of settlements, disclosure of such information would chill settlement discussions with other defendants. The request is also unduly burdensome. Claimant further objects because the information, if not confidential, would be equally accessible to WR Grace by subpoena. It would be as burdensome for claimant to assemble the information as for WR Grace to do it.

2. Date the claim was submitted: / /
3. Person or entity against whom the claim was submitted:
4. Description of claim:
5. Was claim settled? ☐ Yes ☐ No
6. Please indicate settlement amount: \$
7. Was the claim dismissed or otherwise disallowed or not honored? ☐ Yes ☐ No
- If yes, provide the basis for dismissal of the claim:*

**PART VIII: CLAIMS BY DEPENDENTS OR RELATED PERSONS**

Objection for the reason that the requested information is vague. Claimant is unclear about what is meant by the term "dependents or related persons". Because of this lack of clarity, claimant will answer only with respect to individuals claimed as dependents on IRS income tax returns currently if the asbestos victim is alive or prior to the time of death if the asbestos victim is deceased.

Name of Dependent or Related Person: _____ Gender: ☐ Male ☐ Female

Last Four Digits of Social Security Number: _____ Birth Date: ____/____/____

Financially Dependent: ☐ Yes ☐ No

Relationship to Injured Party: ☐ Spouse ☐ Child ☐ Other If other, please specify _____

Mailing Address: _____
Address

City _____ State/Province _____ Zip/Postal Code _____

Daytime Telephone number: _____ (____) _____ - _____

PART IX: SUPPORTING DOCUMENTATION

Please use the checklists below to indicate which documents you are submitting with this form.

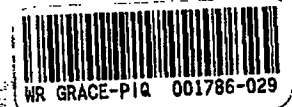
Copies:

- | | |
|---|--|
| <input type="checkbox"/> Medical records and/or report containing a diagnosis | <input type="checkbox"/> X-rays |
| <input type="checkbox"/> Lung function test results | <input type="checkbox"/> X-ray reports/interpretations |
| <input type="checkbox"/> Lung function test interpretations | <input type="checkbox"/> CT scans |
| <input type="checkbox"/> Pathology reports | <input type="checkbox"/> CT scan reports/interpretations |
| <input type="checkbox"/> Supporting documentation of exposure to Grace asbestos-containing products | <input type="checkbox"/> Depositions from lawsuits indicated in Part VII of this Questionnaire |
| <input type="checkbox"/> Supporting documentation of other asbestos exposure | <input type="checkbox"/> Death Certification |

Originals:

- | | |
|---|--|
| <input type="checkbox"/> Medical records and/or report containing a diagnosis | <input type="checkbox"/> Supporting documentation of other asbestos exposure |
| <input type="checkbox"/> Lung function test results | <input type="checkbox"/> X-rays |
| <input type="checkbox"/> Lung function test interpretations | <input type="checkbox"/> X-ray reports/interpretations |
| <input type="checkbox"/> Pathology reports | <input type="checkbox"/> CT scans |
| <input type="checkbox"/> Supporting documentation of exposure to Grace asbestos-containing products | <input type="checkbox"/> CT scan reports/interpretations |
| | <input type="checkbox"/> Death Certification |

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such costs:



PART X: ATTESTATION THAT INFORMATION IS TRUE AND ACCURATE

The information provided in this Questionnaire must be accurate and truthful. This Questionnaire is an official court document that may be used as evidence in any legal proceeding regarding your Claim. The penalty for presenting a fraudulent Questionnaire is a fine of up to \$500,000 or imprisonment for up to five years, or both. 18 U.S.C. §§ 152 & 3571.
TO BE COMPLETED BY THE INJURED PERSON.

I swear, under penalty of perjury, that, to the best of my knowledge, all of the foregoing information contained in this Questionnaire is true

Signature: _____

REDACTED

Date: ~~4/1/06~~ ~~4/1/06~~

Please Print Name: _____

J.P. 1-4-06

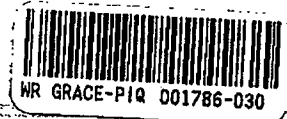
TO BE COMPLETED BY THE LEGAL REPRESENTATIVE OF THE INJURED PERSON.

I swear that, to the best of my knowledge, all of the information contained in this Questionnaire is true, accurate and complete.

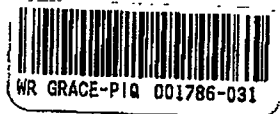
Signature: _____

Date: 11/30/2005

Please Print Name: Lane Clack

**WR Grace - Client Job Summary** P1411-1**Client:****REDACTED**

Approximate Work Years	Job
1969 to 1969	Harry Hill High School, Lansing, MI
1970 to 1970	Genesee Valley Mall, Flint, MI
1970 to 1971	Flint Northern High School, Flint, MI
1970 to 1970	A.C. Spark Plug, Flint, MI
1970 to 1970	General Motors Parts Plant, Flint, MI
1964 to 1967	General Motors Truck & Bus Plant, Flint, MI



STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF GENESSEE

REDACTED

Plaintiff(s),

Case No: 96-44789-NP

vs.

Acme Insulations, Incorporated,
et al,

Defendants.

GOLDBERG, PERSKY,
JENNINGS & WHITE, P.C.
Joel Persky (P41160)
Lane A. Clack (P38835)
Lee W. Davis (P56448)
Attorney for Plaintiff(s)

PLAINTIFFS' DISCOVERY BROCHURE

NOW COMES the Plaintiff(s) **REDACTED** by and through
their attorneys, GOLDBERG, PERSKY, JENNINGS & WHITE, P.C., and file
the following Discovery Brochure.

Plaintiff incorporates herein by reference in this brochure as
though set forth fully at length the product identification
information disclosed in settlement brochures in any and all
asbestos cases previously filed by the office of Goldberg, Persky,
Jennings & White, P.C. in the Circuit Court for the County of
Genesee.

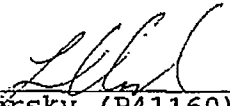
Plaintiff incorporates herein by reference as though set forth
fully at length the product identification information disclosed in
depositions previously taken of the witnesses listed in this
brochure or of witnesses incorporated by reference in this brochure



by reason of those witnesses having been listed in other settlement
brochures filed by Goldberg, Persky, Jennings & White, P.C.

Dated: September 4, 1998 . . . Respectfully submitted,

GOLDBERG, PERSKY,
JENNINGS & WHITE, P.C.
Attorneys for Plaintiffs

By: 
Joel Persky (P41160)
Lane A. Clack (P38835)
Lee W. Davis (P56448)
4800 Fashion Square Boulevard
Suite 260
Saginaw, MI 48604-2602
(517) 799-4848



PLAINTIFF'S DISCOVERY BROCHURE

PLAINTIFF: REDACTED

OCCUPATION: Carpenter

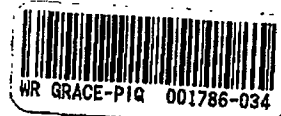
EMPLOYER: General Motors and various construction contractors
(you are referred to Plaintiff's Social Security
Printout)

WORK PLACE: General Motors Truck and Coach Plant, Flint, MI
(1964-1967);
Commercial and Industrial jobs, Flint, Michigan
area

PERIOD WORKED: 1964-1984

JOB CONDITIONS: Open and enclosed, inside areas

NATURE OF EXPOSURE TO ASBESTOS: Continuous involvement in
construction, renovation, alteration and repair work.
Resulting exposures to airborne asbestos fibers occurred from
(1) the handling, fabrication and installation of asbestos
containing building materials consisting of asbestos containing
ceiling tiles, joint compounds; (2) working in cooperation with
and in close proximity to co-workers and other tradesmen such
as Asbestos Insulation Workers, Pipefitters, Plumbers,
Plasterers, Laborers and the Drywall construction trades
involved in the handling, fabrication, sanding and application
of asbestos containing insulation and building products
consisting of asbestos sprays, asbestos boards, ceiling tiles,
acoustical plasters, joint compounds, joint tapes, wall board,
pipecovering, block, cements, castables, etc.; (3) clean-up of
asbestos scrap; (4) shipping, handling and storage of asbestos



products; (5) housekeeping of asbestos products; and from (6) contamination of asbestos dusts in the work place resulting from plant operations and the above existing conditions.

THE FOLLOWING PRODUCT IDENTIFICATION CONSTITUTES A PARTIAL LIST AND REPRESENTATION OF ASBESTOS EXPOSURES:

JOB NO.: 1

PERIOD WORKED: 1964-1967, 2 1/2 Years

JOB SITE AND LOCATION: General Motors Truck and Coach Plant, Flint, MI

EMPLOYER(S): General Motors

INSULATION CONTRACTOR:

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
Calsilite P/C and Block
85% Mag. P/C, Block
and Cement
352 Cement
7M-90 Cement

Insulating Cement
Insulating Cement
Zonolite Insulation
Asb. Wrapped/Lined
Turbines and Generators

MANUFACTURERS

OWENS CORNING FIBERGLAS
RUBEROID CO. (Gaf)

MUNDET CORK (Crown Cork & Seal)
JOHNS-MANVILLE
PHILIP CAREY CO. (Celotex/
Rapid American)
A.P. GREEN REFRACTORIES
GREFCO (General Ref)
W.R. GRACE

GENERAL ELECTRIC

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

REDACTED

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
W.R. GRACE



*Robert Thomas: 4850 Henry Drive, Saginaw, MI 48603
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 W.R. GRACE

Donald Schultz: 21 Valentine Court, Saginaw, MI 48603
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 W.R. GRACE

*John Wagar: 707 S. Warner, Bay City, MI 48706
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 W.R. GRACE



*Robert Abbs: 312 N. Trumbull, Bay City, MI
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 W.R. GRACE

*Thomas Dubay: 5415 Rosedale Place, Saginaw, MI 48603
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 85% Mag. P/C, Block
 and Cement
 352 Cement
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 MUNDET CORK (Crown Cork & Seal)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 W.R. GRACE

*Ronald Hebert: 806 West Borton Rd., Essexville, MI 48732
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas; Brown Insulation.

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 W.R. GRACE



*William Krenz, Jr.: 9906 Woodland, Bayport, MI 48720
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 W.R. GRACE

*Robert Mason: 6725 Marion Street, Palm Point, Englewood, FL 33533

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 W.R. GRACE

Foster Gilson: 3725 Conklin, Saginaw, MI 48603

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Insulating Cement
 Asb. Wrapped/Lined
 Turbines and Generators

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 GENERAL ELECTRIC



JOB NO.: 2

PERIOD WORKED: 1967-1973, Approx. 3 Years

JOB SITE AND LOCATION: Several schools and small commercial buildings,

EMPLOYER(S): Owens Corning Fiberglas Corp.

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Coon DeVisser; Owens Corning Fiberglas; Hollinger & Co.; Bay City Hardware; Jennison Hardware

PRODUCTS

Kaylo P/C and Block
OC 660 Cement
Calsilite P/C and Block
7M Cement
Thermobestos P/C and Block
352 Cement
Careytemp P/C and Block

7M-90 Cement

Insulating Cement
Insulating Cement
Asb. Ceiling Tile
Asb. Refractory Cement
Acoustical Plaster
Joint Compounds
Acoustical Plaster
Joint Compounds
Asb. Gaskets
Asb. Gaskets and Packing
Asb. Gaskets and Packing
Asb. Gaskets
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
RUBEROID CO. (Gaf)
RUBEROID CO. (Gaf)
JOHNS-MANVILLE
JOHNS-MANVILLE
PHILIP CAREY CO. (Celotex/
Rapid American)
PHILIP CAREY CO. (Celotex/
Rapid American)
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
ELOF HANSSON
RUTLAND FIRE CLAY
UNITED STATES GYPSUM
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GOLDBOND (National Gypsum)
GARLOCK, INC.
ANCHOR PACKING COMPANY
PALMETTO (Greene, Tweed)
DURABLA MANUFACTURING
W.R. GRACE

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

*

REDACTED

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Ceiling Tile
Asb. Refractory Cement
Joint Compounds
Acoustical Plaster
Joint Compounds
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
ELOF HANSSON
RUTLAND FIRE CLAY
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GOLDBOND (National Gypsum)
W.R. GRACE



Albert Hildebrandt: 3140 North Thomas, Freeland, MI 48623

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Ceiling Tile
Acoustical Plaster
Joint Compounds
Acoustical Plaster
Joint Compounds
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
ELOF HANSSON
UNITED STATES GYPSUM
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GOLDBOND (National Gypsum)
W.R. GRACE

Eugene Thomas: 4000 Harold, #113, Saginaw, MI 48601

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Ceiling Tile
Acoustical Plaster
Joint Compounds
Acoustical Plaster
Joint Compounds
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
ELOF HANSSON
UNITED STATES GYPSUM
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GOLDBOND (National Gypsum)
W.R. GRACE

Emery Chartier: 539 Dodson Court, Bay City, MI 48708

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Ceiling Tile
Acoustical Plaster
Joint Compounds
Acoustical Plaster
Joint Compounds
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
ELOF HANSSON
UNITED STATES GYPSUM
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GOLDBOND (National Gypsum)
W.R. GRACE

Ed Bigelow: 3970 East Britton Rd., Bancroft, MI 48414

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Ceiling Tile
Acoustical Plaster
Joint Compounds
Acoustical Plaster
Joint Compounds
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
ELOF HANSSON
UNITED STATES GYPSUM
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GOLDBOND (National Gypsum)
W.R. GRACE



*Ronald Clampitt: 6298 Hess Road, Vassar, MI 48768

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Refractory Cement
Joint Compounds
Joint Compounds
Asb. Gaskets
Asb. Gaskets and Packing
Asb. Gaskets and Packing
Asb. Gaskets
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
RUTLAND FIRE CLAY
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GARLOCK, INC.
ANCHOR PACKING COMPANY
PALMETTO (Greene, Tweed)
DURABLA MANUFACTURING
W.R. GRACE

*John C. Wenn: P.O. Box 310961, Flint, MI 48531-0961

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Asb. Refractory Cement
Joint Compounds
Joint Compounds
Asb. Gaskets
Asb. Gaskets and Packing
Asb. Gaskets and Packing
Asb. Gaskets
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
RUTLAND FIRE CLAY
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GARLOCK, INC.
ANCHOR PACKING COMPANY
PALMETTO (Greene, Tweed)
DURABLA MANUFACTURING
W.R. GRACE

Kenneth Lewis: 449 West Gloucester, Saginaw, MI 48603

PRODUCTS

Kaylo P/C and Block
Joint Compounds
Joint Compounds
Asb. Gaskets
Asb. Gaskets and Packing
Asb. Gaskets and Packing
Asb. Gaskets

MANUFACTURERS

OWENS CORNING FIBERGLAS
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GARLOCK, INC.
ANCHOR PACKING COMPANY
PALMETTO (Greene, Tweed)
DURABLA MANUFACTURING



*Gerald Duquette: 4877 Simpson Road, Owosso, MI 48867
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 Thermobestos P/C and Block
 352 Cement
 Careytemp P/C and Block

7M-90 Cement

Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 JOHNS-MANVILLE
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE

*Glen Brimmer: 2727 Sanlan Ranch Drive, Lakeland, FL 33813
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 OC 660 Cement
 352 Cement
 7M-90 Cement

Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE



*Robert Abbs: 312 N. Trumbull, Bay City, MI
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Owens Corning Fiberglas; Hollinger &
 Co.; Bay City Hardware; Jennison Hardware

PRODUCTS

Kaylo P/C and Block
 OC 660 Cement
 Calsilite P/C and Block
 7M Cement
 Thermobestos P/C and Block
 352 Cement
 Careytemp P/C and Block
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE

*Michael Willman: 7210 Deborah Drive, Saginaw, MI 48603
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Owens Corning Fiberglas; Hollinger &
 Co.; Bay City Hardware; Jennison Hardware

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 7M Cement
 Thermobestos P/C and Block
 352 Cement
 Careytemp P/C and Block
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE



*Jerome Dasky: 564 West Salzburg Rd., Auburn, MI 48611
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Hollinger & Co.; Bay City Hardware; Jennison Hardware

PRODUCTS

Kaylo P/C and Block
 Calsilite P/C and Block
 7M Cement
 Thermobestos P/C and Block
 352 Cement
 Careytemp P/C and Block
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE

*Duane Vizina: Box 4, Afton, MI 49705
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: C. DeVisser; Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 Thermobestos P/C and Block
 352 Cement
 7M-90 Cement

Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 JOHNS-MANVILLE
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE



*Pat Kelley: 3292 Ponemah Drive, Fenton, MI 48430
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 OC 660 Cement
 352 Cement
 7M-90 Cement

Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE

*Frank Egan: 1955 Mack Rd., Saginaw, MI 48601
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Coon DeVisser; Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 OC 660 Cement
 352 Cement
 7M-90 Cement

Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE



Donald Krenz: 9860 Woodland Drive, Box 194, Bayport, MI 48720
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Coon DeVisser; Owens Corning Fiberglas

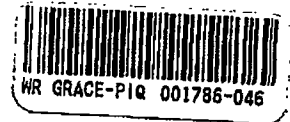
PRODUCTS

Kaylo P/C and Block
OC 660 Cement
352 Cement
7M-90 Cement

Joint Compounds
Joint Compounds
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
JOHNS-MANVILLE
PHILIP CAREY CO. (Celotex/
Rapid American)
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
W.R. GRACE



JOB NO.: 3

PERIOD WORKED: 1968-1969, Approx. 8 Months

JOB SITE AND LOCATION: General Motors Buick Plant, Flint, MI

EMPLOYER(S): Owens Corning Fiberglas

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
OC660 Cement
Calsilite P/C and Block
352 Cement
7M-90 Cement

Insulating Cement
Insulating Cement
Lite Kastite
Light Weight Castables
Asb. Insulating and
Finishing Cement
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
RUBEROID CO. (Gaf)
JOHNS-MANVILLE
PHILIP CAREY CO. (Celotex/
Rapid American)
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
CHICAGO FIRE BRICK
HARBISON WALKER

PLIBRICO
W.R. GRACE

CO-WORKER WITNESSES: The following individuals have been
contacted and it is anticipated that they will be able to
identify the use of some, several or all of the above
identified asbestos product exposures:

REDACTED

PRODUCTS

Kaylo P/C and Block
Insulating Cement
Insulating Cement
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
W.R. GRACE



*John Wagar: 707 S. Warner, Bay City, MI 48706
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
OC660 Cement
Calsilite P/C and Block
352 Cement
7M-90 Cement

Insulating Cement
Insulating Cement
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
RUBEROID CO. (Gaf)
JOHNS-MANVILLE
PHILIP CAREY CO. (Celotex/
Rapid American)
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
W.R. GRACE

*Robert Abbs: 312 N. Trumbull, Bay City, MI
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
OC660 Cement
Calsilite P/C and Block
352 Cement
7M-90 Cement

Insulating Cement
Insulating Cement
Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
RUBEROID CO. (Gaf)
JOHNS-MANVILLE
PHILIP CAREY CO. (Celotex/
Rapid American)
A.P. GREEN REFRACTORIES
GREFCO (General Ref.)
W.R. GRACE



*Ronald Hebert: 806 West Borton Rd., Essexville, MI
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas; Brown Insulation

PRODUCTS

Kaylo P/C and Block
 OC660 Cement
 Calsilite P/C and Block
 352 Cement
 7M-90 Cement

Insulating Cement
 Insulating Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 RUBEROID CO. (Gaf)
 JOHNS-MANVILLE
 PHILIP CAREY CO. (Celotex/
 Rapid American)
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 W.R. GRACE

*Robert Prusky: 1166 Trayer Road, Bronson, MI 49028

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Insulating Cement
 Lite Kastite
 Light Weight Castables
 Asb. Insulating and
 Finishing Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 CHICAGO FIRE BRICK
 HARBISON WALKER
 PLIBRICO
 W.R. GRACE

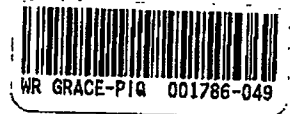
*John Fortener: 15621 Fordline, Southgate, MI 48195

PRODUCTS

Kaylo P/C and Block
 Insulating Cement
 Insulating Cement
 Lite Kastite
 Light Weight Castables
 Asb. Insulating and
 Finishing Cement
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 A.P. GREEN REFRACTORIES
 GREFCO (General Ref.)
 CHICAGO FIRE BRICK
 HARBISON WALKER
 PLIBRICO
 W.R. GRACE



JOB NO.: 4

PERIOD WORKED: 1968; 1969-1970, Approx. 3 Months

JOB SITE AND LOCATION: Schools and Hospital job, Milford, MI

EMPLOYER(S): McLean Acoustical

INSULATION CONTRACTOR:

PRODUCTS

Asb. Ceiling Tiles
Acoustical Plaster
Joint Compounds
Joint Compounds
Zonolite Insulation

MANUFACTURERS

ELOF HANSSON
UNITED STATES GYPSUM
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
W.R. GRACE

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

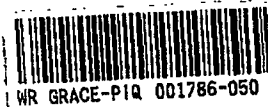
REDACTED

PRODUCTS

Asb. Ceiling Tiles
Acoustical Plaster
Joint Compounds
Joint Compounds
Zonolite Insulation

MANUFACTURERS

ELOF HANSSON
UNITED STATES GYPSUM
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
W.R. GRACE



JOB NO.: 5

PERIOD WORKED: 1969, Approx. 7 Months

JOB SITE AND LOCATION: Harry Hill High School, Lansing, MI

EMPLOYER(S): William Reichenbach

INSULATION CONTRACTOR:

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Owens Corning Fiberglas; William Reichenbach

PRODUCTS

Kaylo P/C and Block
OC 660 Cement
Joint Compounds
Joint Compounds
Asb. Gaskets
Asb. Gaskets and Packing
Asb. Gaskets and Packing
Asb. Gaskets
Pyrospray Fireproofing
Sprayed Asb. Fireproofing

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GARLOCK, INC.
ANCHOR PACKING COMPANY
PALMETTO (Greene, Tweed)
FLEXITALLIC
BALDWIN-EHRET-HILL (Keene)
ASBESTOSPRAY CORP.

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

REDACTED

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Owens Corning Fiberglas; William Reichenbach

PRODUCTS

Kaylo P/C and Block
Joint Compounds
Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)

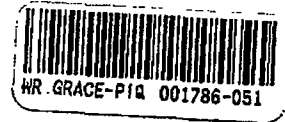
*Kenneth Behl: 8230 Braden Road, Haslett, MI 48840

PRODUCTS

Kaylo P/C and Block
Joint Compounds
Joint Compounds
Asb. Gaskets
Asb. Gaskets and Packing
Asb. Gaskets and Packing
Asb. Gaskets

MANUFACTURERS

OWENS CORNING FIBERGLAS
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)
GARLOCK, INC.
ANCHOR PACKING COMPANY
PALMETTO (Greene, Tweed)
FLEXITALLIC



*Patrick Stefanick: 12702 Melody Road, Grand Ledge, MI 48837

PRODUCTS

Kaylo P/C and Block
 Joint Compounds
 Joint Compounds
 Asb. Gaskets
 Asb. Gaskets and Packing
 Asb. Gaskets and Packing
 Asb. Gaskets

MANUFACTURERS

OWENS CORNING FIBERGLAS
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 GARLOCK, INC.
 ANCHOR PACKING COMPANY
 PALMETTO (Greene, Tweed)
 FLEXITALLIC

*Richard Buxton: 2189 N. Cedar Street, Holt, MI 48842
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 OC 660 Cement
 Joint Compounds
 Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)

Tom Damon: 1-807 Upton Road, Bath, MI 48808
 CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
 OC 660 Cement
 Joint Compounds
 Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)



*Theodore Kingsley: 580 N. Waverly Road, Diamondale, MI 48821
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
OC 660 Cement
Joint Compounds
Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)

Ron Little: 2685 Benston Road, Whitehall, MI 49461
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Owens Corning Fiberglas

PRODUCTS

Kaylo P/C and Block
OC 660 Cement
Joint Compounds
Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS
OWENS CORNING FIBERGLAS
UNITED STATES GYPSUM
GOLDBOND (National Gypsum)

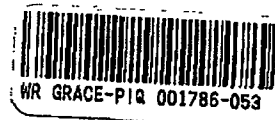
*Frank Puente: 924 North Walnut, Lansing, Michigan 48906
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: William Reichenbach

PRODUCTS

Pyrospray Fireproofing
Sprayed Asb. Fireproofing

MANUFACTURERS

BALDWIN-EHRET-HILL (Kene)
ASBESTOSPRAY CORP.



Joe Foster: 4801 Island Highway, Charlotte, MI
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: William Reichenbach

PRODUCTS

Pyrospray Fireproofing
Sprayed Asb. Fireproofing

MANUFACTURERS

BALDWIN-EHRET-HILL (Keene)
ASBESTOSPRAY CORP.

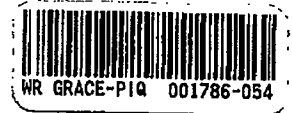
George Foster: 498 Sheffield Drive, Lansing, MI
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOB SITES
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: William Reichenbach

PRODUCTS

Pyrospray Fireproofing
Sprayed Asb. Fireproofing

MANUFACTURERS

BALDWIN-EHRET-HILL (Keene)
ASBESTOSPRAY CORP.



JOB NO.: 6

PERIOD WORKED: 1970, Approx. 4 Months

JOB SITE AND LOCATION: AC Spark Plug, Flint, MI

EMPLOYER(S): Owens Corning Fiberglas Corp.

INSULATION CONTRACTOR:

PRODUCTS

Unibestos P/C

Kaylo P/C

Insulating Cement

Insulating Cement

Zonolite Insulation

MANUFACTURERS

PITTSBURGH CORNING

OWENS CORNING FIBERGLAS

A.P. GREEN REFRACTORIES

GREFCO (General Ref.)

W.R. GRACE

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

REDACTED

PRODUCTS

Unibestos P/C

Kaylo P/C

Insulating Cement

Insulating Cement

Zonolite Insulation

MANUFACTURERS

PITTSBURGH CORNING

OWENS CORNING FIBERGLAS

A.P. GREEN REFRACTORIES

GREFCO (General Ref.)

W.R. GRACE



JOB NO.: 7

PERIOD WORKED: 1970, 8 Months

JOB SITE AND LOCATION: Genesee Valley Plaza, Flint, MI

EMPLOYER(S): Owens Corning Fiberglas

INSULATION CONTRACTOR:

PRODUCTS

Cafco Sprayed Asbestos
 Kaylo P/C and Block
 OC660 Cement
 Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

U.S. MINERAL PRODUCTS
 OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

REDACTEDPRODUCTS

Cafco Sprayed Asbestos
 Kaylo P/C and Block
 Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

U.S. MINERAL PRODUCTS
 OWENS CORNING FIBERGLAS
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE

*Albert Hildebrandt: 3140 North Thomas, Freeland, MI 48623

PRODUCTS

Cafco Sprayed Asbestos

MANUFACTURERS

U.S. MINERAL PRODUCT

*Ronald Hebert: 806 West Borton Road, Essexville, MI 48732

PRODUCTS

Kaylo P/C and Block
 OC660 Cement
 Joint Compounds
 Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)

*Robert Abbs: 312 N. Trumbull, Bay City, MI

PRODUCTS

Kaylo P/C and Block
 OC660 Cement
 Joint Compounds
 Joint Compounds
 Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS
 OWENS CORNING FIBERGLAS
 UNITED STATES GYPSUM
 GOLDBOND (National Gypsum)
 W.R. GRACE



*Ronald Holcomb: 2547 Shaffer Rd., Midland, MI 48640

PRODUCTS

Kaylo P/C and Block

Joint Compounds

Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS

UNITED STATES GYPSUM

GOLDBOND (National Gypsum)

*Robert Krenz: 2075 South Bradleyville Rd., Reese, MI 48757

PRODUCTS

Kaylo P/C and Block

Joint Compounds

Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS

UNITED STATES GYPSUM

GOLDBOND (National Gypsum)

*Mike Kelley: 3321 West Ridgeway, Flint, MI 48504

PRODUCTS

Kaylo P/C and Block

Joint Compounds

Joint Compounds

MANUFACTURERS

OWENS CORNING FIBERGLAS

UNITED STATES GYPSUM

GOLDBOND (National Gypsum)

*Ralph Zeitler: 449 West Gloucester, Saginaw, MI 48603

PRODUCTS

Kaylo P/C and Block

OC660 Cement

Joint Compounds

Joint Compounds

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS

OWENS CORNING FIBERGLAS

UNITED STATES GYPSUM

GOLDBOND (National Gypsum)

W.R. GRACE

*Gerald Duquette: 426 N. Washington, Owosso, MI 48867

PRODUCTS

Kaylo P/C and Block

OC660 Cement

Joint Compounds

Joint Compounds

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS

OWENS CORNING FIBERGLAS

UNITED STATES GYPSUM

GOLDBOND (National Gypsum)

W.R. GRACE

*Robert Salois: 5439 Baxman Road, Bay City, MI 48706.

PRODUCTS

Kaylo P/C and Block

OC660 Cement

Joint Compounds

Joint Compounds

Zonolite Insulation

MANUFACTURERS

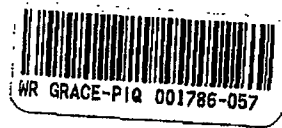
OWENS CORNING FIBERGLAS

OWENS CORNING FIBERGLAS

UNITED STATES GYPSUM

GOLDBOND (National Gypsum)

W.R. GRACE



Donald Krenz: 9860 Woodland Drive, Box 194, Bayport, MI 48720

PRODUCTS

Kaylo P/C and Block

OC660 Cement

Joint Compounds

Joint Compounds

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS

OWENS CORNING FIBERGLAS

UNITED STATES GYPSUM

GOLDBOND (National Gypsum)

W.R. GRACE

*Edwin Bigelow: 3970 East Britton Road, Bancroft, MI 48414

PRODUCTS

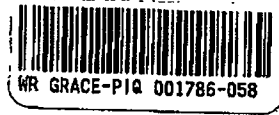
Cafco Sprayed Asbestos

MANUFACTURERS

U.S. MINERAL PRODUCTS

DOCUMENTATION:

United States Mineral Cafco invoices with reference to the supply and use of Cafco Sprayed Asbestos at Genesee Valley Shopping Plaza.



JOB NO.: 8

PERIOD WORKED: 1970, Approx. 3 Months

JOB SITE AND LOCATION: General Motors Parts Plant, Flint, MI

EMPLOYER(S): Owens Corning Fiberglas

INSULATION CONTRACTOR:

PRODUCTS

Kaylo P/C

Insulating Cement

Insulating Cement

Zonolite Insulation

MANUFACTURERS

OWENS CORNING FIBERGLAS

A.P. GREEN REFRACTORIES

GREFCO (General Ref.)

W.R. GRACE

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

REDACTED

PRODUCTS

Kaylo P/C

Insulating Cement

Insulating Cement

Zonolite Insulation

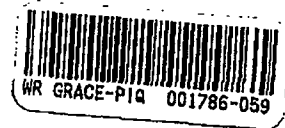
MANUFACTURERS

OWENS CORNING FIBERGLAS

A.P. GREEN REFRACTORIES

GREFCO (General Ref.)

W.R. GRACE



JOB NO.: 9

PERIOD WORKED: 1970-1971; 3 Months

JOB SITE AND LOCATION: Flint Northern High School, Flint, MI

EMPLOYER(S): Tri-City Acoustical

INSULATION CONTRACTOR:

PRODUCTS

Monokote Sprayed
Fireproofing

MANUFACTURERS

W.R. GRACE

CO-WORKER WITNESSES: The following individuals have been contacted and it is anticipated that they will be able to identify the use of some, several or all of the above identified asbestos product exposures:

REDACTED

PRODUCTS

Monokote Sprayed
Fireproofing

MANUFACTURERS

W.R. GRACE

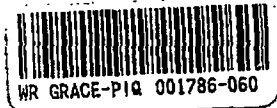
*Edwin Bigelow: 3970 East Britton Road, Bancroft, MI 48414

PRODUCTS

Monokote Sprayed
Fireproofing

MANUFACTURERS

W.R. GRACE



DOCUMENTATION AS TO ALL EXPOSURES:

Any and all records of GENERAL MOTORS CORPORATION, includes all purchase orders, invoices, vendor files, product brochures, heat insulation standards, correspondences, account payable ledgers, material requisitions and inventories, etc.

Employment records of Plaintiff,

REDACTED

Union records of Plaintiff,

Custodian of Records of GENERAL MOTORS CORPORATION.


Any and all business records and product literature of defendants named in this suit, includes all purchase orders, invoices, product brochures, insulation manuals, data books, publications, correspondences, etc.

Custodian of Records of Defendants names in this suit.

All advertisements, publications and promotions of defendant manufacturers and distributors in this suit.

Photographs of all identified products.


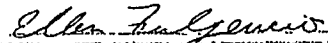
*Denotes that the witness is a Plaintiff in an asbestos action.


LANE A. CLACK (P38835)
Attorney for Plaintiff(s)
4800 Fashion Square Blvd.
Suite 260
Saginaw, Michigan 48604
(517) 799-4848

DATED: September 2, 1998

ldkc:\wp\saginaw\

REDACTED

 September 2, 1998
I declare under the penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.


Attorneys of Record List

REDACTED



96-44789-NP
P1411:1400

Shelley K. Miller, Esq.
Vandeveer Garzia
220 Park Street
Suite 300
Birmingham, MI 48009-3477
Telephone: 248-645-0100
Fax: 248-645-2430
Attorney for Acme Insulations

Stephen L. Witenoff, Esq.
Thomas, DeGroot, Witenoff & Hoffman
400 Galleria Officentre
Suite 550
Southfield, MI 48034
Telephone: 248-353-4450
Fax: 248-353-4451
Attorney for Alexander Stafford

Jill E. Diaz, Esq.
Segal, McCambridge, Singer & Mahoney,
Ltd.
303 Detroit Street, Suite 301
Ann Arbor, MI 48104
Telephone: 313-327-2810
Fax: 312-782-0710
Attorney for Anchor Packing

Paul R. Vantol, Esq.
Martin, Bacon & Martin, PC
44 First Street
Mt. Clemens, MI 48043-2523
Telephone: 810-979-6500
Fax: 810-468-7016
Attorney for Argo Packing

Leonard B. Schwartz, Esq.
Sommers, Schwartz, Silver & Schwartz,
PC
2000 Town Center
Suite 900
Southfield, MI 48075-1100
Telephone: 810-355-0300
Fax: 810-746-4001
Attorney for Asbestospray Corp.

Steven M. Hickey, Esq.
Hickey & Cianciolo, PC
400 Renaissance Center
Suite 1010
Detroit, MI 48243
Telephone: 313-396-4600
Fax: 313-396-4601
Attorney for Atlas Asbestos

Richard F. Brennan, Esq.
Attorney at Law
555 South Woodward
Suite 755
Birmingham, MI 48009
Telephone: 810-433-3160
Fax: 810-433-3164
Attorney for Austin Company

Reynolds A. Brander, Jr., Esq.
Reynolds Brander, PC
201 Monroe Avenue NW
Suite 701 River City Building
Grand Rapids, MI 49503
Telephone: 616-458-3800
Fax: 616-458-3885
Attorney for Basic, Inc.

S. David McNeill, Esq.
Freeman McNeill
3290 West Big Beaver Road
Suite 425
Troy, MI 48084
Telephone: 248-643-9433
Fax: 248-643-9023
Attorney for Bay City Hardware

John F. Sopt, Esq.
John F. Sopt, PC
2550 South Telegraph
Suite 250
Bloomfield Hills, MI 48302
Telephone: 248-332-5660
Fax: 248-332-8073
Attorney for Bigelow-Liptak

Mark W. LaChey, Esq.
Attorney at Law
123 South Main Street
Suite 130
Royal Oak, MI 48067
Telephone: 248-543-3838
Fax: 248-543-3909
Attorney for Brown Insulation

Dale R. Burmeister, Esq.
Harvey Kruse
1050 Wilshire Drive
Suite 320
Troy, MI 48084
Telephone: 248-649-7800
Fax: 248-649-2316
Attorney for CCR

J. Michael Malloy, III, Esq.
Holahan, Malloy, Maybaugh & Monnich
2690 Crooks Road
Suite 100
Troy, MI 48084-4700
Telephone: 248-362-4747
Fax: 248-362-4779
Attorney for Chicago Fire & Brick

John F. Sopt, Esq.
John F. Sopt, PC
2550 South Telegraph
Suite 250
Bloomfield Hills, MI 48302
Telephone: 248-332-5660
Fax: 248-332-8073
Attorney for Coon Devisser

Edward H. Pappas, Esq.
Dickinson, Wright, Moon, VanDusen &
Freeman
525 North Woodward Avenue
P.O. Box 509
Bloomfield Hills, MI 48303-0509
Telephone: 810-646-4300
Fax: 810-433-7274
Attorney for Crown Cork & Seal

Attorneys of Record List

Page 2



REDACTED

-44789-NP
11:1400

ayton F. Farrell, Esq.
llins, Einhorn, Farrell & Ulanoff, PC
00 Town Center
ite 909
lthfield, MI 48075
Telephone: 248-355-4141
x: 248-355-2277
orney for Dresser Industries

Gary D. Sharp, Esq.
Foley & Mansfield, PLLP
6905 Telegraph Road
Suite 114
Bloomfield Hills, MI 48301
Telephone: 248-540-9636
Fax: 248-540-9639
Attorney for Durabla Mfg.

Jeffrey Bullard, Esq.
Ogne, Alberts & Stuart, PC
755 West Big Beaver Road
Suite 1800
Troy, MI 48084-4903
Telephone: 248-362-3707
Fax: 248-362-0422
Attorney for Durametallic Corp.

Stephen L. Witenoff, Esq.
James, DeGrood, Witenoff & Hoffman
1 Galleria Officentre
ite 550
lthfield, MI 48034
Telephone: 248-353-4450
x: 248-353-4451
orney for Elof Hanson

Daniel P. King, Esq.
Pedersen, Keenan, King, Wachsberg &
Andrzejak
30201 Orchard Lake Road #220
Farmington Hills, MI 48334-2278
Telephone: 248-932-9300
Fax: 248-932-9310
Attorney for F.B. Wright

Bruce F. MacFarlane, Esq.
Blake, Kirchner, Symonds, MacFarlane,
Larson & Smith, PC
535 Griswold
1432 Buhl Building
Detroit, MI 48226
Telephone: 313-961-7321
Fax: 313-961-5972
Attorney for Foster Wheeler

Col J. Dufraine, Esq.
Col J. Dufraine, PC
50 Livernois
ite 102
oy, MI 48083-5000
Telephone: 248-619-9334
x: 248-619-9349
orney for Friendship Materials

Jill E. Diaz, Esq.
Segal, McCambridge, Singer & Mahoney,
Ltd.
303 Detroit Street, Suite 301
Ann Arbor, MI 48104
Telephone: 313-327-2810
Fax: 312-782-0710
Attorney for Garlock

Donald B. Miller, Esq.
Butzel Long
150 West Jefferson Avenue
Suite 900
Detroit, MI 48226-4430
Telephone: 313-225-7020
Fax: 313-225-7080
Attorney for General Electric

ry D. Sharp, Esq.
ley & Mansfield, PLLP
05 Telegraph Road
ite 114
oomfield Hills, MI 48301
Telephone: 248-540-9636
x: 248-540-9639
orney for General Refractories

Steven M. Hickey, Esq.
Hickey & Cianciolo, PC
400 Renaissance Center
Suite 1010
Detroit, MI 48243
Telephone: 313-396-4600
Fax: 313-396-4601
Attorney for Grant Wilson

Jeffrey Bullard, Esq.
Ogne, Alberts & Stuart, PC
755 West Big Beaver Road
Suite 1800
Troy, MI 48084-4903
Telephone: 248-362-3707
Fax: 248-362-0422
Attorney for Greene Tweed

chard L. MacArthur, Esq.
MacArthur, Murray & Associates, PC
18 West Big Beaver Road
ite 780
oy, MI 48084
Telephone: 248-362-7440
x: 248-362-7459
orney for Harrison Piping

Patrick M. Fishman, Esq.
Hickey & Cianciolo, PC
400 Renaissance Center
Suite 1010
Detroit, MI 48243
Telephone: 313-396-4600
Fax: 313-396-4601
Attorney for Hercules Chemical

Bruce F. MacFarlane, Esq.
Blake, Kirchner, Symonds, MacFarlane,
Larson & Smith, PC
535 Griswold
1432 Buhl Building
Detroit, MI 48226
Telephone: 313-961-7321
Fax: 313-961-5972
Attorney for Hollinger

Attorneys of Record List



REDACTED

6-44789-NP
1411:1400

Michael W. Cianciolo, Esq.
Hickey & Cianciolo, PC
800 Renaissance Center
Suite 1010
Detroit, MI 48243
Telephone: 313-396-4600
Fax: 313-396-4601
Attorney for Jennison Hardware

Michael J. Sullivan, Esq.
Clark Hill, PLC
300 Woodward Avenue
Suite 3500
Detroit, MI 48226-3435
Telephone: 313-965-8387
Fax: 313-962-4348
Attorney for Kaiser Refractories

Steven M. Hickey, Esq.
Hickey & Cianciolo, PC
800 Renaissance Center
Suite 1010
Detroit, MI 48243
Telephone: 313-396-4600
Fax: 313-396-4601
Attorney for Michigan Medical

Michael L. Freeman, Esq.
Freeman McNeill
290 West Big Beaver Road
Suite 425
Troy, MI 48084
Telephone: 248-643-9433
Fax: 248-643-9023
Attorney for PPG Industries

Joretta M. Ames, Esq.
Hunkett & Cooney, PC
343 Congress
Suite 800
Detroit, MI 48226-3260
Telephone: 313-965-3900
Fax: 313-961-0029
Attorney for Rapid-American

Duncan H. Brown, Esq.
Highland & Zanetti, PC
24445 Northwestern Highway
Suite 205
Southfield, MI 48075-6598
Telephone: 810-352-9580
Fax: 810-352-4617
Attorney for John Crane-Houdaille

S. David McNeill, Esq.
Freeman McNeill
3290 West Big Beaver Road
Suite 425
Troy, MI 48084
Telephone: 248-643-9433
Fax: 248-643-9023
Attorney for M.H. Detrick

Richard R. Malone, Esq.
Malone & Ault
Suite 2300
405 Madison Avenue
Toledo, OH 43604
Telephone: 419-242-6066
Fax: 419-242-1605
Attorney for Midland Ross

James J. Hayes, Jr., Esq.
Garan, Lucow, Miller, Seward, Cooper &
Becker, PC
1000 Woodbridge Street
Detroit, MI 48207-3192
Telephone: 313-446-1530
Fax: 313-259-0450
Attorney for Pittsburgh Corning

Robert A. Marsac, Esq.
Wise & Marsac, PC
11th Floor Buhl Building
Detroit, MI 48226
Telephone: 313-962-0643
Fax: 313-962-0688
Attorney for Riley Stoker

Carol Winter Grombala, Esq.
Kohl, Secrest, Wardle, Lynch, Clark &
Hampton, PC
30903 Northwestern Highway
P.O. Box 3040
Farmington Hills, MI 48333-3040
Telephone: 248-851-9500
Fax: 248-851-2158
Attorney for John E. Green

John M. Callison, Esq.
Attorney at Law
707 North Michigan Avenue
Saginaw, MI 48602
Telephone: 517-754-6562
Fax: 517-754-9330
Attorney for Mechanical Ins.

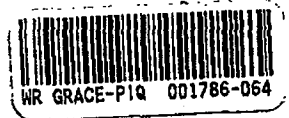
Mark A. Wisniewski, Esq.
Kitch, Drutchas, Wagner & Kenney, PC
One Woodward Avenue
10th Floor
Detroit, MI 48226
Telephone: 313-965-7900
Fax: 313-965-7403
Attorney for Owens-Corning

Wayne L. Ogne, Esq.
Ogne, Alberts & Stuart, PC
755 West Big Beaver Road
Suite 1800
Troy, MI 48084-4903
Telephone: 248-362-3707
Fax: 248-362-0422
Attorney for Plibrico

Jeffrey Bullard, Esq.
Ogne, Alberts & Stuart, PC
755 West Big Beaver Road
Suite 1800
Troy, MI 48084-4903
Telephone: 248-362-3707
Fax: 248-362-0422
Attorney for Robertson-Ceco

Attorneys of Record List

REDACTED



44789-NP
11:1400

Kelly Cullen, Esq.
nion, Huckabay, Bodary, Padilla &
ganti, PC
Towne Square, Suite 1400
Box 5068
thfield, MI 48086-5068
ophone: 248-357-1400
: 248-357-3343
orney for Rutland Fire Clay

rael W. Cianciolo, Esq.
ey & Cianciolo, PC
Renaissance Center
e 1010
oit, MI 48243
ophone: 313-396-4600
: 313-396-4601
orney for Standard Fuel

y J. Pawlowski, Esq.
ey, Kruse, Westen & Milan, PC
J Wilshire Drive
e 320
r, MI 48084
ophone: 248-649-7800
: 248-649-2316
orney for U.S. Mineral

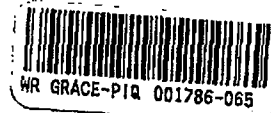
Carol Winter Grombala, Esq.
Kohl, Secrest, Wardle, Lynch, Clark &
Hampton, PC
30903 Northwestern Highway
P.O. Box 3040
Farmington Hills, MI 48333-3040
Telephone: 248-851-9500
Fax: 248-851-2158
Attorney for Schad Boiler

Paul R. Vantol, Esq.
Martin, Bacon & Martin, PC
44 First Street
Mt. Clemens, MI 48043-2523
Telephone: 810-979-6500
Fax: 810-468-7016
Attorney for The Carborundum Co.

William E. Osantowski, Esq.
Foley & Mansfield, PLLP
6905 Telegraph Road
Suite 114
Bloomfield Hills, MI 48301
Telephone: 248-540-9636
Fax: 248-540-9639
Attorney for Wickes Lumber

Michael R. McCandless, Esq.
Bigler, Berry & Johnston, Szytkiel &
Hunt, PC
1301 West Long Lake Road
Suite 250
Troy, MI 48098-6348
Telephone: 248-641-1800
Fax: 248-641-3845
Attorney for Sealite, Inc.

Carol Winter Grombala, Esq.
Kohl, Secrest, Wardle, Lynch, Clark &
Hampton, PC
30903 Northwestern Highway
P.O. Box 3040
Farmington Hills, MI 48333-3040
Telephone: 248-851-9500
Fax: 248-851-2158
Attorney for Townsend & Bottum



PHONE 517/377-1000
FAX: 517/377-0310



Affiliated with
St. Lawrence Hospital and Healthcare Services
1210 West Saginaw, Lansing, Michigan 48915-1999

September 19, 1996

Mr. Lane Clack
Goldberg, Persky, Jennings & White, P.C.
Plaza North, Suite 260
4800 Fashion Square Boulevard
Saginaw, MI 48604-2602

CARES Employee Assistance Program
Drugs of Abuse Testing
Industrial Hygiene
Managed Care
Occupational Rehabilitation Center
Pavilion Occupational Health Services
Preventive Services

RE: REDACTED

Dear Mr. Clack:

REDACTED

comes to me today, August 16, 1996, with a history of respiratory and hypertensive difficulties.

PRESENT ILLNESS: has had respiratory difficulties developing for some time. There has been gradual deterioration. He is short of breath with exertion. He has used inhalers, both Proventil and Intal, and is using Intal fairly regularly with Proventil being used up to twice a day. There is some chest congestion and some sensitivity to dust and other volatile and irritating materials. There is cough, but generally no phlegm production. He has no difficulty sleeping at night and there is no snoring, although there is nocturia once or twice a night. He is short of breath when climbing a flight of stairs. Most activities of his job are done without difficulties, although he is not in a physically-demanding occupation at this time. There are no orthostatic complaints when coughing or short of breath, except with the paroxysms of cough that do produce light-headed complaints. There is no history of tuberculosis, pneumonia, or broken or cracked ribs.

OCCUPATIONAL HISTORY: worked as a carpenter since 1967. Prior to his employment as a carpenter, he worked in a grocery store for a short period of time, in a gas station, and he did work at General Motors at the truck plant doing assembly work for about two years. He last worked as a carpenter in about 1983. Since then, he has been working as a supervisor and is on construction sites at least 75 percent of the time, but has done only about a year's worth of work with the tools. In his work as a carpenter, he has done industrial and commercial work most of the time. He has worked with asbestos-containing materials from insulation to acoustical tile. He has worked with asbestos board and transite. He has worked with other trades, pipefitters and pipecoverers. He has worked with fireproofing. He has been sprayed. He has removed insulation as part of his work with ceilings, and he describes visible dust

REDACTED



REDACTED

Re:
Page 2

about 50 percent of the time that he was employed from 1967 to 1983. He does not believe he has had much exposure to asbestos since 1983.

PAST MEDICAL HISTORY: Past medical history is remarkable for an appendectomy.

SOCIAL HISTORY: smokes cigarettes. He has been smoking a pack and a half a day for about 30 years. There is no alcohol use. He drinks 7-8 cups of coffee daily. There are some Penicillin allergies. He is not sure of his last tetanus shot.

REVIEW OF SYSTEMS: Review of systems shows occasional ringing in the ears with vertigo. There are the above-mentioned respiratory problems.

FAMILY HISTORY: Family history is unremarkable. His parents are alive and in good health, as are brothers, sisters and children.

PHYSICAL EXAMINATION: Physical exam shows a well-developed, well-nourished male. Blood pressure is 130/90. Weight is 200 lbs. Height is 6'0". Head, ears, eyes, nose, and throat show Grade I atherosclerotic disease in the fundus. Ears, nose, throat, thyroid, carotids, and lymphatic system are otherwise unremarkable. There is some sinus congestion. Chest exam shows end inspiratory crackling, no clearing with cough. Heart shows regular rhythm. Breast exam is normal. Abdomen is within normal limits. Genitourinary shows a normal male. Guaiac is negative. Prostate is normal. No hernia. Musculoskeletal exam is within normal limits. Neurologic exam shows normal vibration, reflexes, and light touch.

LABORATORY: Blood chemistries show a slight elevation of cholesterol. Blood counts are normal. Arterial blood gases are essentially normal. The EKG is within normal limits. The audiogram shows a moderate high frequency hearing loss. The urinalysis is essentially normal. Pulmonary function study shows a forced vital capacity of 4.36, or 84% of predicted. FEV1/FVC ratio is 79%. FEF25/75 is 3.29, or 89% of predicted. Lung volumes measures show a total lung capacity of 6.93, 94% of predicted. Other lung volume measures are normal. Diffusion is reduced at 55%. The chest x-ray is reviewed from August 16, 1996. There are increased interstitial markings: ILO reading of 1/1, with s and t sized opacities. There is pleural plaquing in the left hemi-diaphragm and the left pleura. Grade A1

REVIEW OF PAST MEDICAL RECORDS: Review of past medical records shows CT scan reports from April, 1996, showing interstitial changes in the lower lung fields. Pulmonary function studies in April show a forced vital capacity of 2.73 that rises dramatically to 4.05 with bronchodilators. FEV1 rises dramatically from 2.56 to 3.94 with bronchodilators.

IMPRESSIONS

- 1 Asbestosis
- 2 Noise-induced hearing loss



Re:
Page 3

REDACTED

DISCUSSION: There is sufficient laboratory and clinical evidence to establish a diagnosis of asbestosis. The diagnosis is based upon the long history of exposure to asbestos and asbestos-related products, as well as the signs and symptoms of chronic lung disease, namely shortness of breath and crackling on chest exam. Laboratory data shows the characteristic abnormalities of an interstitial fibrotic lung disease with both parenchymal and pleural disease on chest x-ray. Given the total clinical picture, there is a mild amount of impairment.

REDACTED

is advised to obtain yearly pulmonary function studies as the best means to measure his risk for disease development in the future, to receive yearly stool exams for occult blood, and prompt treatment for all upper respiratory tract infections. Appropriate vaccinations for flu and pneumonia are recommended as well. is advised that he is at increased risk for the development of lung cancer, as 20 to 40% of individuals with this clinical presentation do, in fact, go on to develop cancer.

is strongly advised to stop smoking cigarettes immediately, as the continued use of cigarettes will worsen his risk for disease development in the future.

Given the dramatic response that has occurred with bronchodilators, the use of inhalable steroids might be efficacious as well. Clinical response, of course, would be most important.

Sincerely,

R. Michael Kelly, M.D., M.P.H.
Medical Director
Occupational Health Services

RMK:hgm

REDACTED

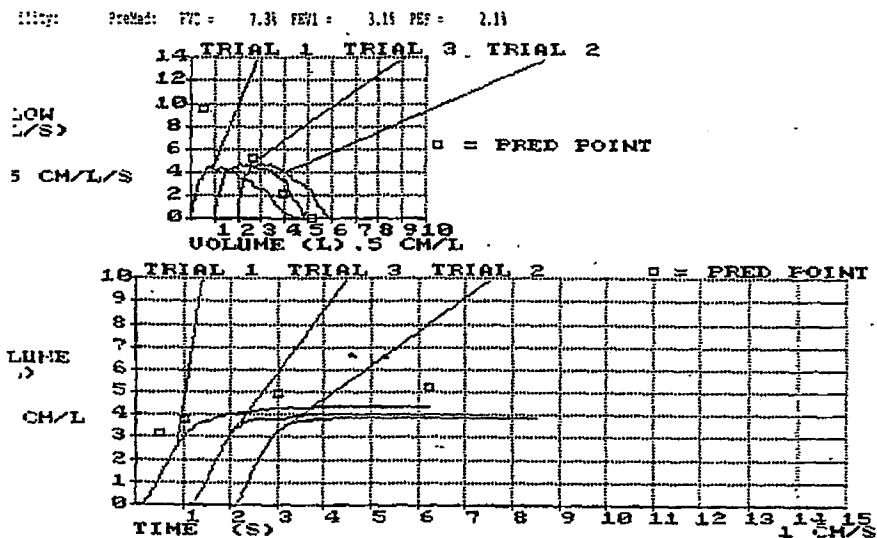
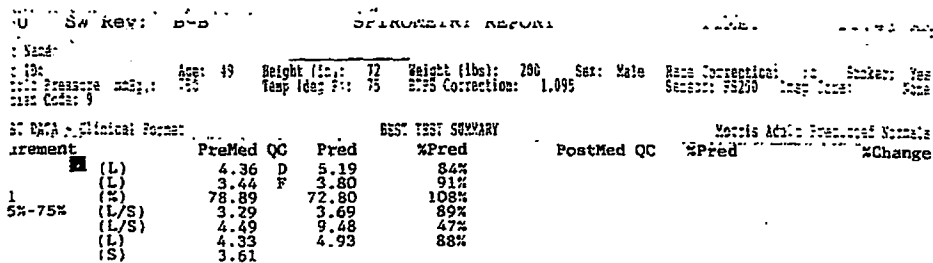


REDACTED

St. Lawrence Hospital
Pulmonary Function Lab - 1210 W. Saginaw St.
Lansing, MI 48915 1-517-377-0111

Ref: ID: Kelly Date: 18-Aug-88
Race: Caucasian Height: 72 in Weight: 200.0 lbs Sex: M
Pr: CP/OHS BSA: 2.13 Age: 49 yr
Name: Kelly, Michael Technician: Zipple RRT, RPFT

	PRE-BRONCH			POST-BRONCH		
	Actual	Pred.	%Pred.	Actual	%Pred.	%Chng
<u>INSPIRING VOLUMES</u>						
Tidal Volume (L)	1.58	1.24	87			
Functional Residual Capacity (L)	2.81	3.58	78			
Residual Volume (L)	1.73	1.68	104			
IRV (Fleth) (L)	4.10	3.78	138			
ERV (Fleth) (L)	2.37	2.12	112			
RV (Fleth) (L)	6.93	7.38	94			
TL (Fleth) (%)	34	28				
<u>INSPIRING DIFFUSION</u>						
CO (ml/min/mmHg)	21.56	39.01	55			
CO (ml/min/mmHg)	22.64	38.38	59			
VECLAR VOLUME (L)	7.04	7.11	99			
DLA (ml/min/mmHg/L)	3.21	5.28	61			
<u>POOD CASES</u>						
Hb (gm/dL)	15.4	12-18		15.4		
SPBOX HEMOGLOBIN (%)	7.3	<1.5%		7.3		



merits:

Physician Signature

Physician Signature _____

ST. LAWRENCE
Work & Health
INSTITUTE

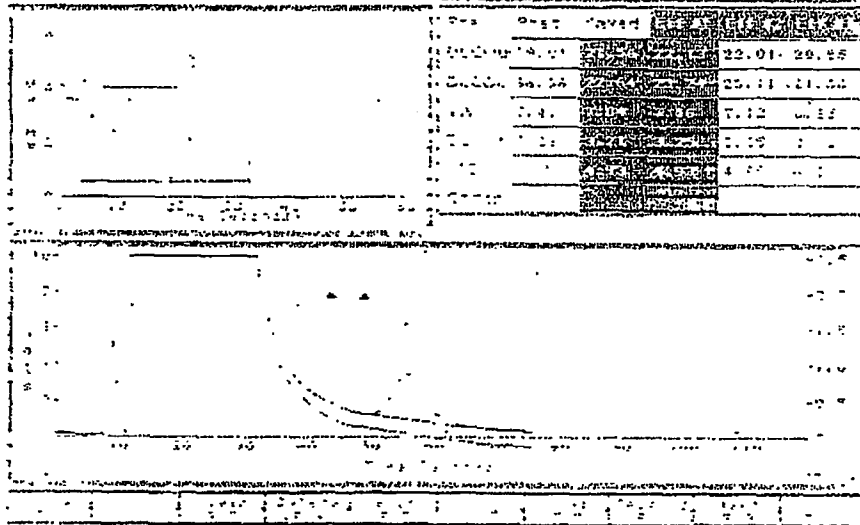
© 1997 Sisters of Mercy Health Corporation



St. Lawrence Hospital
Pulmonary Function Lab - 1210 W. Saginaw St.
Lansing, MI 48915 1-517-337-0111

Ref: [illegible] Date: 10-13-06
 Patient: [illegible] Height: 70 in Weight: 170.0 lbs Sex: M
 Age: 48 yrs Test: [illegible] Tech: [illegible]

Flow Effort Session
 [illegible]





STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE

REDACTED

Case No: 96-44789-NP

Plaintiffs,

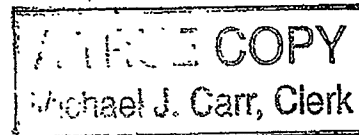
vs.

Hon. Thomas C. ...

Acme Insulations, Incorporated,
et al,

Defendants.

GOLDBERG, PERSKY,
JENNINGS & WHITE, P.C.
Attorneys for Plaintiffs
By: Joel Persky (P41160)
Peter T. Paladino, Jr. (P54358)
Lane A. Clack (P38835)
Lee W. Davis (P56448)



ORDER TO FILE AMENDED COMPLAINT AND CAPTION

At a session of said Court, held in the County
Courthouse, City of Flint, Genesee County,
Michigan, on _____.

PRESENT: HONORABLE
Circuit Judge

Upon filing Plaintiffs' Notice of Entering Order to file
Amended Complaints and Captions, and having received no written
objections thereto within seven (7) days,

IT IS HEREBY ORDERED that the Plaintiffs are hereby allowed to
file Amended Complaints adding A.P. GREEN REFRACTORIES CO., a
Delaware corporation; ARMSTRONG WORLD INDUSTRIES, INC., f/k/a
ARMSTRONG CORK COMPANY, a Pennsylvania corporation; ASBESTOS CLAIMS
MANAGEMENT CORPORATION f/k/a NATIONAL GYPSUM COMPANY, a Delaware
corporation; FLEXITALLIC GASKET COMPANY, INC., a Connecticut
corporation; GAF CORPORATION, a Delaware corporation, in its own
right and as successor to THE RUBEROID COMPANY; UNITED STATES
GYPSUM COMPANY, a Delaware corporation, in its own right and as
successor in interest to U.S. GYPSUM COMPANY, an Illinois
corporation, as party defendants, attached to said Notice of
Entering Order.

JUDITH A. FULLERTON
P-20455

Circuit Court Judge

10-21-98



ASBESTOS DOCKET

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE

REDACTED

Plaintiff,

Case No. 96-44789-NP

vs.

ACME INSULATIONS, INCORPORATED, a Michigan corporation;
ALEXANDER STAFFORD CORPORATION, a Michigan corporation;
ANCHOR PACKING COMPANY, a Delaware corporation;
ARGO PACKING COMPANY, a Pennsylvania corporation;
ASBESTOSPRAY CORPORATION, a foreign corporation;
ATLAS TURNER, INC., f/k/a ATLAS ASBESTOS COMPANY, a Canadian corporation;
AUSTIN COMPANY, an Ohio corporation;
BASIC, INCORPORATED, a Delaware corporation;
BAY CITY HARDWARE COMPANY, a Michigan corporation;
BIGELOW-LIPTAK CORPORATION, a Michigan corporation;
BROWN INSULATION COMPANY, a Michigan corporation, in its own right and as successor to PERCY BROWN, d/b/a BROWN INSULATION COMPANY;
THE CARBORUNDUM COMPANY, INCORPORATED, a Delaware corporation;
CHICAGO FIREBRICK CO., a Delaware corporation;
COON DEVISSER COMPANY, a Michigan corporation;
CROWN CORK & SEAL COMPANY, a New York corporation;
DRESSER INDUSTRIES, INC., f/k/a HARBISON AND WALKER REFRACTORIES, a Delaware corporation;
DURABLE MANUFACTURING COMPANY, a foreign corporation;
DURAMETALLIC CORPORATION, a Michigan corporation;
DURO SUPPLY, a Michigan corporation;
ELOF HANNSON, INC., a foreign corporation;
F.B. WRIGHT CO., a Michigan corporation;
FOSTER WHEELER CORPORATION, a New York corporation;
FRIENDSHIP MATERIALS, INC., a Michigan corporation;
GARLOCK INC., an Ohio corporation;
GENERAL ELECTRIC COMPANY, a New York corporation;
GENERAL REFRACTORIES, COMPANY, a foreign corporation;
GRANT WILSON, INCORPORATED, an Illinois corporation;
GREENE TWEED & CO., a Pennsylvania corporation;
HARRISON PIPING SUPPLY COMPANY, a Michigan corporation;
HERCULES CHEMICAL CORPORATION, a Delaware corporation;
HI-TEMP PRODUCTS, INC., f/k/a ASBESTOS SPECIALITIES CO., a Michigan corporation;
HOLLINGER & CO., a Michigan corporation;
JENNISON HARDWARE COMPANY, a Michigan corporation;



JOHN CRANE-HOUDAILLE, INC., a Delaware corporation, in its own right and as successor to CRANE PACKING COMPANY, an Illinois corporation;

JOHN E. GREEN COMPANY, a Michigan corporation;

KAISER ALUMINUM AND CHEMICAL CORPORATION, in its own right and as successor to KAISER REFRACTORIES a Division of KAISER ALUMINUM, a Delaware corporation;

MECHANICAL INSULATION SERVICES, INC., a Michigan corporation, in its own right and as successor to J.W. WILLMAN and to J.W. WILLMAN ASBESTOS COMPANY;

M.H. DETRICK COMPANY, a Delaware corporation;

MIDLAND ROSS CORPORATION, an Ohio corporation;

NORTH AMERICAN REFRACTORIES COMPANY, an Ohio corporation;

OWENS-CORNING FIBERGLAS CORPORATION, a Delaware corporation;

OWENS-ILLINOIS, INC., an Ohio corporation;

PITTSBURGH CORNING CORPORATION, a Pennsylvania corporation;

PLIBRICO COMPANY, a Delaware corporation;

PPG INDUSTRIES, INC., a Pennsylvania corporation;

RAPID-AMERICAN CORPORATION, a Delaware corp., in its own right and as successor to PHILIP CAREY MANUFACTURING COMPANY and PANACON CORPORATION and PHILIP CAREY CORPORATION;

RILEY STOKER CORPORATION, a Massachusetts corporation;

ROBERTSON-CECO CORPORATION, a Delaware corporation, f/k/a CECO CORPORATION and as H.H. ROBERTSON COMPANY;

RUTLAND FIRE CLAY COMPANY, a Vermont corporation;

SCHAD BOILER SETTING COMPANY, d/b/a SCHAD REFRACTORY CONSTRUCTION COMPANY, a Michigan corporation;

SEALITE, INC., a California corporation;

STANDARD FUEL ENGINEERING COMPANY, a Delaware corporation;

TOWNSEND & BOTTUM, INC., a Michigan corporation;

UNITED STATES MINERAL PRODUCTS CO., a/k/a UNITED STATES MINERAL PRODUCTS COMPANY, f/k/a UNITED STATES MINERAL WOOL COMPANY, a New Jersey corporation, in its own right and as successor to and/or f/k/a COLUMBIA ACOUSTICS AND FIREPROOFING COMPANY;

WICKES LUMBER COMPANY, a Delaware corporation;

W.R. GRACE & CO.-CONN., a Connecticut corporation;

A.P. GREEN REFRACTORIES CO., a Delaware corporation;

ARMSTRONG WORLD INDUSTRIES, INC., f/k/a ARMSTRONG CORK COMPANY, a Pennsylvania corporation;

ASBESTOS CLAIMS MANAGEMENT CORPORATION f/k/a NATIONAL GYPSUM COMPANY, a Delaware corporation;

FLEXITALLIC GASKET COMPANY, INC., a Connecticut corporation;

GAF CORPORATION, a Delaware corporation, in its own right and as successor to THE RUBEROID COMPANY;

UNITED STATES GYPSUM COMPANY, a Delaware corporation, in its own right and as successor in interest to U.S. GYPSUM COMPANY, an Illinois corporation;

Jointly and severally,



Defendants.

GOLDBERG, PERSKY,
JENNINGS & WHITE, P.C.
Attorneys for Plaintiff
By: Joel Persky (P41160)
Lane A. Clack (P38835)

PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint.

NOW COMES Plaintiff by and through his respective counsel state for his Complaint as follows:

GENERAL ALLEGATIONS

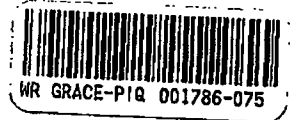
1. That all or part of this cause of action arose in the County of Genesee, State of Michigan. REDACTED

2. That the Plaintiff, during the times herein mentioned and complained of, to-wit: from 1964 to 1984 was a resident of the State of REDACTED

and that the significant injurious exposures to asbestos took place as a result of asbestos fiber released at job sites located within Genesee County, within the State of Michigan.

3. That Plaintiff has contracted Asbestosis and/or other asbestos related diseases as a result of exposure to asbestos.

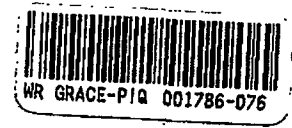
4. That Plaintiff says that during the years 1964 to 1984, Plaintiff was employed as a Carpenter, and that in the course of his duties in such capacities, he was required to handle and



REDACTED

otherwise be exposed to and come into contact with large quantities of asbestos dust and fibers mined, produced, installed, prescribed, engineered, specified, licensed, sold and/or distributed by the above named defendants, installed and/or being installed and/or used in his work environs. That in addition to the fact that Plaintiff, actually removed, applied, and otherwise used some of the products mined, produced, specified, manufactured, prescribed, engineered, distributed, installed, licensed and/or sold by the above named defendants, and specifically many and various construction products containing asbestos, Plaintiff says that on many jobs, while Plaintiff did not use the specific products mined, produced, manufactured, prescribed, engineered, distributed, specified, installed, licensed and/or sold by Defendants, Plaintiff was nevertheless exposed to the dangerous materials, and especially, asbestos fibers from such products which were used by his employers or by other workers on job sites serviced by the Plaintiff in his aforesaid vocations.

5. That during the period of time in which Plaintiff was employed as a Carpenter, from on or about the years 1964 to 1984, in the course of his employment, due to the negligence and carelessness of the Defendants, he was caused to come in contact with the said asbestos products specified, mined, produced, engineered, manufactured, licensed, installed, distributed and/or sold by the defendants, and directly in consequence of said negligence and carelessness of the defendants, did sustain severe, permanent and disabling injuries, resulting in total, permanent and



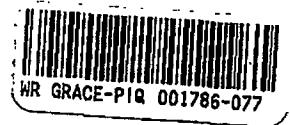
progressive disability, and a serious impairment of his earning capacity.

6. That venue is proper in Genesee County because at least one Defendant resides or has a place of business, or conducts business in said county or has a registered office in said county, or pursuant to other facts and circumstances satisfies the requirements of MCLA §600.1621, 600.1627, and 600.1629.

7. That all Defendants are subject to the jurisdiction of the State of Michigan by virtue of their activities within this State.

8. The amount in controversy exceeds Ten Thousand (\$10,000.00) Dollars exclusive of costs, interest and attorneys fees.

9. Plaintiff consents to jurisdiction in the State of Michigan.



COUNT I

NEGLIGENCE

10. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

11. At all times and places mentioned herein, Defendants were miners, millers, manufacturers, distributors, processors, importers, convertors, compounders, merchants and promoters of asbestos and asbestos-containing products.

12. Plaintiff has been exposed to asbestos-containing products of Defendants, which Plaintiff inhaled or otherwise ingested.

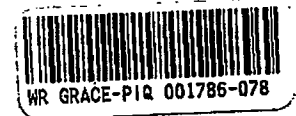
13. Plaintiff's exposures were foreseeable by Defendants.

14. At all times material hereto, Defendants, jointly and severally, owed a duty to Plaintiff and to all others similarly situated, to design, manufacture, formulate, develop standards, prepare, process, inspect, test, market, advertise, package and label the above-mentioned products in a manner reasonably calculated to permit said asbestos products to be used without endangering the health and safety of persons such as the Plaintiff in the use of such products. Furthermore, Defendants owed a duty to warn and instruct regarding the use of such products.

15. Defendants, jointly and severally, breached their duty to Plaintiff in the following particulars:

a. failed to adequately warn Plaintiff of the dangerous characteristics of asbestos and asbestos-containing products;

b. failed to provide Plaintiff with information as to



what would be reasonably safe and sufficient wearing apparel and proper protective equipment and appliances, to protect Plaintiff from being harmed and disabled by exposure to asbestos and asbestos containing materials;

c. failed to place adequate warnings on containers of said asbestos and asbestos-containing materials to warn of the health hazards associated with coming into contact with said asbestos and asbestos-containing materials;

d. failed to take reasonable precaution or exercise reasonable care to publish, adopt and enforce safety plans and/or a safe method of handling and installing asbestos and asbestos-containing materials;

e. failed to adopt and utilize a substitute material to eliminate asbestos fibers in the products produced;

f. failed to test asbestos and asbestos-containing materials to determine their disease causing propensities prior to releasing these products for sale and, if in fact any Defendant tested these products, then said Defendants were negligent in concealing the results from the public;

g. failed to properly design and manufacture the products;

h. failed to formulate the products so as to minimize or eliminate their toxic effects upon their users;

i. failed to properly prepare, inspect and process said products so that they would not be transferred from the manufacturers' possession in a defective state and that said



products would be reasonably fit for the particular purpose intended and of merchantable quality;

j. failed to properly prepare, process and manufacture the products;

k. failed to properly package the products;

l. failed to adequately label and give adequate warnings and instructions regarding the composition and use of the products and their possible toxic affects upon their users;

m. failed to properly market and advertise said products;

n. failed to advise and warn of the scientifically recognized synergism between exposure to asbestos in conjunction with smoking, alcohol and other agents;

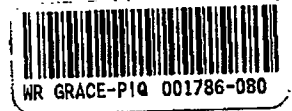
o. failed to act in a reasonable and prudent manner.

16. As a direct and proximate result of Defendants' aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

17. Plaintiff has contracted an asbestos related disease and suffers other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation, indignity, disability, loss of the joys, pleasures and vitalities of life and will continue to do so into the future.

18. Plaintiff is at great risk or has developed lung cancer, and/or mesothelioma, and/or other malignant cancers and as a result is extremely fearful of developing such cancers.

19. Plaintiff experiences severe mental anguish regarding his



greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

20. That as a result of Plaintiff's asbestos related condition, he/she is substantially at risk of premature death and as a result suffers from great pain of mind and body.

21. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

22. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

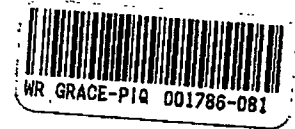
23. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

24. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.

COUNT II

CONCERT OF ACTION



25. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

26. That at all times herein mentioned one, several or all of the Defendants named above, their officers, directors, employees, agents or servants acting on their behalf, engaged in concerted activities, namely express or implied agreements regarding the mining, milling, manufacturing, designing, engineering, licensing, producing, assembling, marketing, supplying, installing, delivering, promoting, and/or retarding the development of industry wide standards relating to the use of asbestos and asbestos-containing products which Defendants knew, or in the exercise of reasonable care, should have known, were deleterious , poisonous, and highly harmful to Plaintiff.

27. Plaintiff may not be able to identify all of the asbestos containing products of the various Defendants due to the generic similarity of such products as produced as promoted by these Defendants.

28. That as a result of the said concerted activities in which Defendants engaged, the Plaintiff was injured though the use and/or exposure to asbestos or asbestos-containing products of Defendants.

29. That due to the concert of action among each of the various Defendants, each is liable to the Plaintiff for injuries sustained even if there was no direct exposure to, and use of,



products produced by a particular Defendant.

30. Defendants are jointly and severally liable to the Plaintiff for the injuries and damages sustained by Plaintiff.

31. As a direct and proximate result of Defendants aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

32. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation, and indignity and will continue to do so into the future.

33. Plaintiff is at great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing such cancers.

34. Plaintiff experiences severe mental anguish regarding his greater risk to develop numerous forms of cancer and/or progressive shortness of breath.

35. That as a result of Plaintiff's asbestos related condition he/she is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

36. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

37. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

38. Plaintiff suffers from such other injuries and damages as hereinabove set forth.



39. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT III

CONSPIRACY

40. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

41. The Defendants did conspire by willfully and wantonly placing into the stream of commerce instrumentalities which they knew or reasonably should have known would cause unlawful, serious and permanent bodily injury or death to Plaintiff or others similarly situated.

42. Many decades ago the Defendants became aware that asbestos would cause serious, debilitating, life shortening and life ending health problems.

43. Notwithstanding said knowledge in the possession of the Defendants they knowingly, maliciously, wantonly and for mercenary reasons, entered into an agreement tacit or otherwise, to conceal said knowledge and further, did agree to continue on as vendors of asbestos and asbestos-containing products thereby furthering the ends of their conspiracy.

44. That this agreement and course of conduct on the part of the several Defendants originated in the period of 1930, or earlier, and has continued to the present.

45. That each Defendant at some time relevant to Plaintiff's cause of action, acted in furtherance of said conspiracy.

46. Pursuant to the conspiracy between the several Defendants, they retained control of the existing and developing markets, retarded the development of industry wide standards and



through products which they knew were hazardous , feloniously caused great bodily harm and/or death.

47. As a direct and proximate result of Defendants' aforementioned tortious and illegal acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

48. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.

49. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

50. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

51. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

52. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

53. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

54. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

55. Defendants are jointly and severally liable to Plaintiff



for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT IV

ALTERNATIVE LIABILITY

56. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

57. Defendants, acting independently have concurrently breached a duty owed to Plaintiff in their manufacture, design, selection, assembly, marketing, distribution, sale, supply, delivery and promotion of asbestos-containing products which were generically similar and fungible in nature.

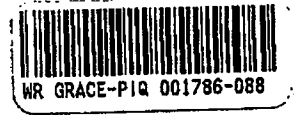
58. Defendants, acting independently and concurrently each breached the same duty to Plaintiff by contributing to the placement of asbestos-containing products into the stream of interstate commerce, which products were independently the direct and proximate cause of the injuries and damages sustained by Plaintiff.

59. Plaintiff is unable to identify the specific Defendant responsible for placing specific asbestos or asbestos-containing products into the stream of commerce.

60. Defendants were each in a position to mitigate and alleviate the danger to Plaintiff from exposure to the asbestos-containing products produced and promoted by each of them, but each Defendant, independently and concurrently failed to so mitigate that risk.

61. Defendants are jointly and severally liable to Plaintiff, for the injuries and damages.

62. As a direct and proximate result of aforementioned



tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

63. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.

64. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

65. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

66. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

67. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

68. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

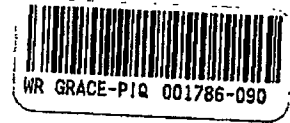
69. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

70. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount



in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT V

ENTERPRISE LIABILITY

71. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

72. That all Defendants herein agreed to or independently adhered to an industry wide practice or custom not to warn of the dangers of asbestos.

73. Plaintiff cannot identify the specific Defendant responsible for the asbestos products to which he was exposed.

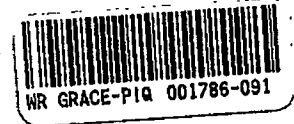
74. Plaintiff's injuries and damages complained of were directly and proximately caused by exposure to asbestos-containing products produced and/or promoted by the several Defendants under and in adherence to said insufficient and inadequate industry wide standards.

75. The several Defendants, controlled various shares of the asbestos industry market within the geographical region in which Plaintiff was employed.

76. Defendants are jointly liable to Plaintiff for injuries and damages sustained.

77. As a direct and proximate result of aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

78. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.



79. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

80. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

81. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

82. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

83. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

84. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

85. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT VI

STRICT LIABILITY

86. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of this Complaint as if set out in full.

87. At all times and places mentioned herein, Defendants collectively and individually were engaged in the asbestos industry.

88. The asbestos and asbestos-containing products manufactured, designed, assembled, maintained for sale, marketed, distributed, sold, supplied, delivered and promoted by Defendants was used by Plaintiff and those similarly situated in a foreseeable manner.

89. At all times pertinent hereto, the said asbestos products were unreasonably dangerous and in a defective condition.

90. Defendants' unreasonably dangerous and defective products were a direct and proximate cause of the injuries sustained by Plaintiff.

91. Defendants are jointly and severally strictly liable to the Plaintiff for injuries and damages.

92. As a direct and proximate result of aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

93. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.



94. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

95. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

96. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

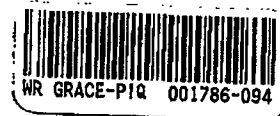
97. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

98. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

99. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

100. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT VII

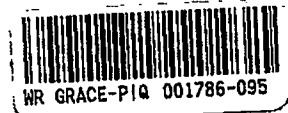
WARRANTY

101. Plaintiff hereby incorporates and adopts by reference all allegations in all Counts of This Complaint as if set out in full.

102. The Defendants herein, jointly and severally owe the Plaintiff a contractual duty to dispense a product which comported with the implied or express warranties attached to said product. The warranties which were attached to Defendant's products at the time of manufacture, design, distribution, sale, supply, delivery, marketing and promotion of asbestos-containing products, were that said products are:

- a. of good and merchantable quality;
- b. properly designed and manufactured;
- c. fit for the ordinary purposes for which such goods are/were used;
- d. adequately contained;
- e. adequately packaged;
- f. adequately labeled;
- g. conformed to the promises or affirmation of fact made on the container, labeling, advertising, product specification data or informational literature;
- h. fit for the particular and intended purpose for which the goods are required, the buyer having relied upon Defendants' judgment in selecting and furnishing suitable goods.

103. That notwithstanding said duty the Defendants, jointly and severally, did violate same in that their products:



- a. were not of good and merchantable quality;
- b. were not properly designed and manufactured;
- c. were not fit for the ordinary purposes for which such goods are/were used;
- d. were not adequately contained;
- e. were not adequately packaged;
- f. were not adequately labeled;
- g. did not conform to the promises or affirmations of fact made on the container, labeling, advertising, product specification data or informational literature;
- h. were not fit for the particular and intended purpose for which the goods are required, the buyer having relied upon Defendants' judgment in selecting and furnishing suitable goods.;
- i. failed to warn of the dangers of asbestos and asbestos-containing products;
- j. failed to instruct as to the use of asbestos and asbestos-containing products;
- k. had not been adequately tested so as to ascertain the dangers thereof;
- l. failed to adequately warn and instruct those who foreseeable would come into contact with Defendants' products as to the dangers existing and precautions necessary;
- m. were defectively designed;
- n. were defectively tested;
- o. were improperly packaged, unfit products.

104. As a direct and proximate result of Defendants'



aforementioned tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

105. Plaintiff has contracted an asbestos related disease and suffered other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.

106. Plaintiff is a great risk to or has developed lung cancer, and/or mesothelioma and/or other malignant cancers and as a result is extremely fearful of developing cancers.

107. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

108. That as a result of Plaintiff's asbestos related condition he is substantially at risk of a premature death and as a result suffers from great pain of mind and body.

109. Plaintiff incurred medical bills and other expenses and will continue to do so in the future.

110. Plaintiff sustained wage losses and will continue to sustain wage losses in an undetermined amount, which amount will be demonstrated at trial.

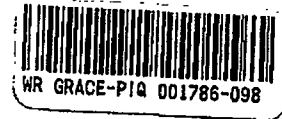
111. Plaintiff suffers from such other injuries and damages as hereinabove set forth.

112. Defendants are jointly and severally liable to Plaintiff for injuries and damages.

WHEREFORE, Plaintiff prays for a judgment against Defendants of actual, consequential, and exemplary damages in whatever amount



in excess of Ten Thousand (\$10,000.00) Dollars Plaintiff is deemed to be entitled by this Honorable Court and/or Jury, together with costs, interest and attorneys fees.



COUNT VIII

WILLFUL AND WANTON MISCONDUCT/INTENTIONAL TORT

113. Plaintiff hereby incorporates and adopts by reference all allegations in all counts of this Complaint as if set out in full.

114. At all times and places mentioned herein, Defendants, were miners, millers, manufacturers, distributors, processors, importers, convertors, compounders, merchants and promoters of asbestos and asbestos-containing products.

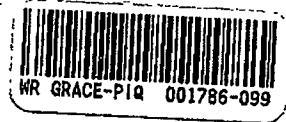
115. Plaintiff has been exposed to asbestos-containing products of Defendants, which Plaintiff inhaled or otherwise ingested.

116. The Defendants had knowledge of the health dangers of asbestos fiber inhalation.

117. Plaintiff's exposures were foreseeable by Defendants.

118. At all times material hereto, Defendants, jointly and severally, owed a duty to Plaintiff and to all others similarly situated, to design, manufacture, formulate, develop standards, prepare, process, inspect, test, market, advertise, package and label the above-mentioned products in a manner reasonably calculated to permit said asbestos products to be used without endangering the health and safety of persons such as the Plaintiff in the use of such products. Furthermore, Defendants owed a duty to warn and instruct regarding the use of such products.

119. That Defendants had the ability to avoid the resulting harm to Plaintiff by ordinary care and diligence in the use of the means at hand.



120. Defendants, jointly and severally, breached their duty to Plaintiff in the following particulars:

a. Committed intentional and/or willful and wanton or reckless acts and misconduct all in disregard for the rights of Plaintiff.

b. Omitted the use of ordinary care and diligence to avert the threatened danger when, to the ordinary mind, it must have been apparent that the result was likely to prove disastrous to another such as Plaintiff.

121. As a direct and proximate result of Defendants' aforementioned intentional and willful, wanton and reckless tortious acts, Plaintiff has sustained serious, incurable and progressive asbestos related disease.

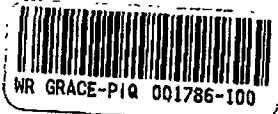
122. Plaintiff has contracted an asbestos related disease and suffers other bodily injuries including great pain of mind and body, shock, disgrace, outrage, humiliation and indignity and will continue to do so into the future.

123. Plaintiff is at great risk or has developed lung cancer, and/or mesothelioma, and/or other malignant cancers.

124. Plaintiff experiences severe mental anguish regarding his greater risk of developing numerous forms of cancer and/or progressive shortness of breath.

125. That as a result of Plaintiff's asbestos related condition, he/she has died or is substantially at risk of premature death and as a result suffers from great pain of mind and body.

126. Plaintiff incurred medical bills and other expenses and



GOLDBERG, PERSKY, JENNINGS & WHITE, P.C.

ATTORNEYS AT LAW

PLAZA NORTH
4800 FASHION SQUARE BOULEVARD, SUITE 260
SAGINAW, MI 48604-2602

FACSIMILE (517) 799-5727
TELEPHONE (517) 799-4848

THEODORE GOLDBERG
JOEL PERSKY
ROBERT L. JENNINGS, JR.
THOMAS W. WHITE*
CRAIG L. VANDERGRIFF*
PETER T. PALADINO, JR.
DAVID P. CHERVENICK*
TERRENCE M. O'BRIEN
JANICE M. SAVINIS*
MARK C. MEYER
JAMES J. BEDORTHA
LANE A. CLACK
BRUCE E. MATTOCK*

DAVID B. RODES*
SIGNE B. O'BRIEN*
JOSEPH J. CIRILANO*
VICKI L. GENSLE*
CHRISTINE L. SALON*
CARLA GUTTILLA*
CHARLES J. McLEIGH*
CINDY STINE*
DIANA N. JACOBS*
ANTHONY J. D'AMICO*
BRIAN ALAN PRIM*
LEE W. DAVIS
AARON J. DELUCA*

* NOT ADMITTED TO PRACTICE
IN MICHIGAN

September 4, 1998

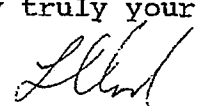
Clerk of the Court
Genesee County Circuit Court
Courthouse
900 East Saginaw Street
Flint, MI 48502

Re: . v. Acme
Insulations, Incorporated, et al
Case No: 96-44789-NP

Dear Clerk:

Enclosed herewith please find the Discovery Brochure and Proof of Service in the above-referred to cause of action which I would appreciate your filing therein.

Very truly yours,


Lane A. Clack

LAC/BTO/ind/P1411/1400

CC: All attorneys of record

Enclosure: Discovery Brochure
Proof of Service

JOHNSTOWN OFFICE:
132 JACKSON STREET
JOHNSTOWN, PA 15901-2134
FAX (814) 539-3981
TELEPHONE (814) 539-4007

GREENSBURG OFFICE:
140 SOUTH MAIN STREET, THIRD FLOOR
GREENSBURG, PA 15601-3102
FAX (412) 832-8747
TELEPHONE (412) 834-7693

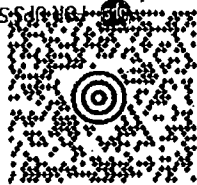
PITTSBURGH OFFICE:
1030 FIFTH AVENUE, THIRD FLOOR
PITTSBURGH, PA 15219-6295
FAX (412) 471-8308
TELEPHONE (412) 471-3980

WEST VIRGINIA OFFICE:
910 FOURTH AVENUE, FOURTEENTH FLOOR
HUNTINGTON, WV 25701-1568
FAX (304) 522-1089
TELEPHONE (304) 522-1087



FROM:
JIT HOOVER
97 799-4848
ILDBERG, PERSKY & WHITE, P.C.
10 FASHION SQUARE BOULEVARD
GINAW MI 48604-2602

32 LBS 1 OF 1



MN 550 2-01

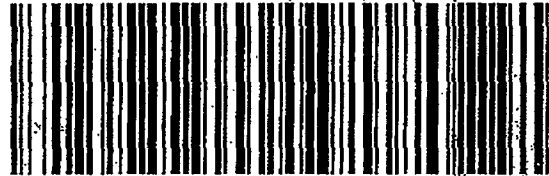


SHIP TO:

W.R. GRACE & CO. BANKRUPTCY
RUST CONSULTING, INC.
201 S. LYNDAL AVE.
FARIBAULT MN 55021

UPS GROUND

TRACKING #: 1Z 457 EW3 03 5504 6253



F 1: MLH-BANK R
F 2: WR GRACE

BILLING: P/P

UOW 7.0.17 hp LaserJet 145.0A 10/2005

Fold here and place in label pouch